



Defendants (as opposed to any one of them) were her “employer” under the IMWL or the IWPCA. This failure dooms Plaintiff’s Complaint under the standard set forth in *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007), and by this Court in *Bohr v. Corrigan Moving Systems*, No. 09 C 4281, 2009 WL 3517748 (N.D. Ill. Oct. 29, 2009).

3. Accordingly, Plaintiff should be required to identify which Defendant (if any) was her alleged employer, and to dismiss the other two Defendants; or allege sufficient facts that would support a theory of joint employer liability. Until then, her Complaint should be dismissed.

WHEREFORE, for the reasons set forth herein and in the accompanying memorandum of law, the Court should dismiss Plaintiff’s Complaint.

Dated: December 10, 2009

Respectfully submitted,

KAPLAN INC., KAPLAN HIGHER EDUCATION  
CORPORATION, and IOWA COLLEGE  
ACQUISITION CORP.

By: s/ Arthur J. Rooney  
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**CERTIFICATE OF SERVICE**

Arthur J. Rooney, an attorney, hereby certifies that on December 10, 2009, he caused true and correct copies of the foregoing to be served via the Court's electronic filing system on the following attorneys of record in this matter:

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